

Honorable Timothy W. Dore
Chapter 7
Hearing Date: **May 13, 2011**
Hearing Time: 9:30 a.m.
Response Date: **May 9, 2011**

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re

No. 11-12266-TWD

ITI INTERNET SERVICES INC.,

Debtor.

NOTICE OF JOINT MOTION FOR ORDER:
(1) COMPELLING TRUSTEE TO PROVIDE AN
IMMEDIATE ACCOUNTING OF MOVANTS'
TRUST FUNDS RECEIVED POST-PETITION;
(2) AUTHORIZING TRUSTEE TO
TEMPORARILY OPERATE DEBTOR'S
BUSINESS FOR LIMITED PURPOSE; AND
(3) FOR OTHER RELIEF

PLEASE TAKE NOTICE that the Joint Motion for Order (1) Compelling Trustee to Provide an Immediate Accounting of Movants' Trust Funds Received Post-Petition; (2) Authorizing Trustee to Temporarily Operate Debtor's Business for Limited Purpose of Completing Electronic Processing and Release of Movants' Trust Funds; and (3) for Other Relief Including Removal of Trustee If Warranted (the "Motion"), **IS SET FOR HEARING ON SHORTENED TIME** as follows:

JUDGE:	The Honorable Timothy W. Dore
PLACE:	700 Stewart Street Courtroom 8106 Seattle, WA 98101
DATE:	May 13, 2011
TIME:	9:30 a.m.
RESPONSE DATE:	May 9, 2011

Copies of the Motion and supporting pleadings are on file with the United States Bankruptcy Court and are available for review during regular business hours. You may also request a copy by email at ida@crockerlaw.com.

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(1) COMPELLING TRUSTEE TO PROVIDE AN IMMEDIATE
ACCOUNTING OF MOVANTS' TRUST FUNDS RECEIVED
POST-PETITION; (2) AUTHORIZING TRUSTEE TO
TEMPORARILY OPERATE DEBTOR'S BUSINESS FOR
LIMITED PURPOSE; AND (3) FOR OTHER RELIEF - 1

Erman Teicher Miller Zucker & Freedman P.C.
400 Galleria Officentre, Suite 444
Southfield, MI 48034
248-827-4100

1 **YOU ARE FURTHER NOTIFIED** that if the Court grants the Motion, brought
2 pursuant to 11 U.S.C. §§704(a)(7), 721, 324, and Fed. R. Bankr. P. 9013, the Trustee will
3 provide an accounting of certain Partially Processed Payments, thereby allowing processing
4 of funds, and transmittal of those funds to the moving parties. The moving parties contend
5 that \$892,943.72 in Partially Processed Payments should be promptly completed.
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8 **IF YOU OPPOSE THE MOTION**, you must file your written response with the
9 Clerk of Court, 700 Stewart St., Seattle, WA 98101, and deliver copies to the undersigned
10 **NOT LATER THAN May 9, 2011**. If no responses are received, the Court may, at its
11 discretion, enter an order without further notice.
12

13 DATED this 25th day of April, 2011.
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15 ERMAN TEICHER MILLER ZUCKER & FREEDMAN
16 P.C.
17

18 By /s/ Craig E. Zucker per fax 4/25/11
19 Craig E. Zucker, MI Bar No. P39907
20 Dianne S. Ruhlandt, MI Bar No. P60483
21 Pro Hac Vice Application Forthcoming
22 Lead Counsel for Electrical Workers Insurance Fund as
23 Receiving Trust Fund for Electrical Workers Fringe Benefit
24 Funds of Local Union #58, IBEW and for Sheet Metal
25 Workers Local Union No. 80 Insurance Trust Fund, as the
26 Receiving Trust
27
28

29 BUTZEL LONG
30

31 By /s/ Thomas B. Radom per email 4/25/11
32 Thomas B. Radom, MI Bar No. P24631
33 Pro Hac Vice Application Forthcoming
34 Counsel for BeneSys Inc. and Painters District Council No. 2,
35 as Receiving Trust
36
37

38 CROCKER LAW GROUP PLLC
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40 By /s/ Tereza Simonyan
41 Shelly Crocker, WSBA #21232
42 Tereza Simonyan, WSBA #41741
43 Local Counsel
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45
46
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